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February 15, 2008

Tam Doduc, Chair and Board Members  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**Via Electronic Mail:** [strategicplan@waterboards.ca.gov](mailto:strategicplan@waterboards.ca.gov)

**Re:** Strategic Plan Update 2008-2012

Dear Chair Doduc and State Board Members:

On behalf of the California Coastkeeper Alliance, representing 12 Waterkeepers spanning the coast from the Oregon border to San Diego, thank you for the opportunity to submit these brief comments on the "Strategic Plan Update 2008-2012." I incorporate herein by reference the detailed comments and suggested specific amendments to the draft Strategic Plan submitted to you today by the Natural Resources Defense Council and Heal the Bay. This letter provides for your consideration some general observations that add to these more detailed comments.

California's waterways are suffering, and their health is steadily eroding. Climate change may represent the proverbial straw that will break the increasingly tenuous balance between our relatively profligate lifestyles and the limited carrying capacity of our waters. The life that depends on these waterways – that is, all of us – cannot help but be increasingly harmed each step that brings us closer to that breaking point.

A Strategic Plan framed around the next five years may well over-estimate the amount of time that California has left to take decisive action to reverse this course. The risks inherent in this sanguine assumption must be offset with clear, aggressive, regularly accountable actions that stop pollution, restore flows, and respect the interdependency of water and life. While this Strategic Plan is a vast improvement over past plans in this regard, particularly with respect to its use of specific targets, it falls short of taking that crucial step of committing fully to the Clean Water Act's goal that the discharge of pollutants be "eliminated," and that all waters be fishable and swimmable.

California and federal laws provide wide authority and mandates to stop the despoiling and diverting of our waterways and to bring waters back to health. For myriad reasons, all of which apparently seem insurmountable but are in fact simply a test of will, much of this authority lies dormant.

For example: the Bay-Delta Estuary flirts with ecological death, and yet “waiver controls” on industrial agriculture continue to amount to little more than crossed fingers. Livestock operations along the Central Coast, implicated in hundreds of serious injuries and deaths from *E. coli* poisoning, continue to pour pollutants into already-fouled waters with no permits at all. Permit writers liberally extend schedules to comply for those dischargers that do hold permits, crippling the little enforcement that is funded regionally and foreclosing action by citizens to protect their own communities. The State Board itself was granted enforcement authority over a year ago but has yet to use it meaningfully or even develop a plan for using it. And waterways continue to be over-allocated and over-drawn, with no clear path for making hard decisions about water “rights” that will be certainly, and perhaps quite soon, be as dry as the paper they are printed on.

We as Californians must see past the distractions and jargon of increasingly complex water policies that further distance us all from our collective right to clean water. We must demand simple truths, implemented broadly – all pollution controlled into all waters, and healthy flows that support living, thriving waterways.

In urging passage of the Clean Water Act over President Nixon’s veto in 1972, Senator Edmund Muskie argued passionately, “Can we afford clean water? Can we afford rivers and lakes and streams and oceans which continue to make life possible on this planet? . . . These questions answer themselves.” We reflexively answer these questions “yes” in our minds. We must answer them “yes” in how we live our lives as well. We must start by committing, fully, to a Strategic Plan that strategically plans for immediate, sweeping actions to control all pollution into all waters, and to ensure healthy flows that support living, thriving waterways. Our “rivers and lakes and streams and oceans” – and our children – deserve no less.

Best regards,

A handwritten signature in black ink, appearing to read "Linda Sheehan", with a long, sweeping underline that extends to the right.

Linda Sheehan  
Executive Director